

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

IOENGINE, LLC,

*Plaintiff/Counterclaim Defendant,*

v.

PAYPAL HOLDINGS, INC.,

*Defendant/Counterclaim Plaintiff.*

C.A. No. 18-452-WCB

**JURY TRIAL DEMANDED**

**UNREDACTED PUBLIC VERSION**

**DECLARATION OF LUKE M. REILLY IN SUPPORT OF IOENGINE, LLC'S  
SUBMISSION REGARDING REMAINING PRETRIAL PROCEEDINGS**

I, Luke M. Reilly, declare as follows:

1. I am an attorney of record for Plaintiff/Counterclaim Defendant IOENGINE, LLC in the above-captioned action. I am over the age of eighteen, licensed to practice law in Pennsylvania, and have been admitted *pro hac vice* to this Court for the above-captioned action. I have personal knowledge of the facts described herein. If called to testify, I could and would do so competently.

2. I submit this Declaration in support of IOENGINE, LLC's Response to PayPal's Status Report and Case Management Proposal.

3. Attached as Exhibit A is a true and correct copy of portions of the transcript of a hearing held before the Court on May 16, 2025.

4. Attached as Exhibit B is a true and correct copy of portions of the Expert Report of Dr. Avi Rubin Regarding Validity of U.S. Patent Nos. 9,059,969 and 9,774,703.

5. Attached as Exhibit C is a true and correct copy of portions of a transcript for the July 13, 2022 jury trial in *Ingenico Inc. v. IOENGINE, LLC*, No. 18-cv-00826-WCB (D. Del.).

6. Attached as Exhibit D is a true and correct copy of portions of the transcript of a hearing held before the Court on July 23, 2021.

7. Attached as Exhibit E is a true a correct copy of portions of the Expert Report of Dr. Avi Rubin Regarding Infringement of U.S. Patent Nos. 9,059,969 and 9,774,703.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 20th day of June, in Philadelphia, Pennsylvania.

/s/ Luke M. Reilly  
Luke M. Reilly